MOTION FILED
MAR 11 1985

No. 84-1294

IN THE

Supreme Court of the United States

OCTOBER TERM, 1984

THE VILLAGES, INC.,

Petitioner,

—v.—

THE METROPOLITAN DEVELOPMENT COMMISSION OF MARION COUNTY,

Respondent.

ON WRIT OF CERTIORARI TO THE COURT OF APPEALS OF INDIANA, THIRD DISTRICT

MOTION FOR LEAVE TO FILE AND BRIEF OF NATIONAL ASSOCIATION OF HOMES FOR CHILDREN AS AMICUS CURIAE

GERALD E. BODELL*
DAVID H. BERMAN
100 Park Avenue
New York, New York 10017
(212) 972-0909

Attorneys for National Homes for Children as Amicus Curiae

**Counsel of Record*

31 pp

IN THE

Supreme Court of the United States

OCTOBER TERM, 1984

No. 84-1294

THE VILLAGES, INC.,

Petitioner,

—v.—

THE METROPOLITAN DEVELOPMENT COMMISSION OF MARION COUNTY,

Respondent.

ON WRIT OF CERTIORARI TO THE COURT OF APPEALS OF INDIANA, THIRD DISTRICT

MOTION FOR LEAVE TO FILE AND BRIEF OF NATIONAL ASSOCIATION OF HOMES FOR CHILDREN AS AMICUS CURIAE

The National Association of Homes For Children (NAHC) respectfully moves pursuant to Rule 36.3 of the Rules of this Court for leave to file the annexed brief as *amicus curiae* in support of the position that the statute at issue, prohibiting a married couple and several foster children from residing together as a single housekeeping unit in a home situated in an area zoned for one family dwelling, is unconstitutional as applied to this particular residence. The consent of counsel for respondent Metropolitan Development Commission of Marion County to the filing of this brief was requested and refused.

This case presents to the Court for the first time the question of the constitutionality of a restrictive zoning ordinance as applied to a residence consisting of houseparents and foster children who, to all outward appearances, function as a family, except that they are not related by blood. cf. *Village of Belle Terre v. Boraas*, 416 U. S. 1, 94 S. Ct. 1536, 39 L. Ed. 2d 797 (1974); *Moore v. City of East Cleveland*, 431 U. S. 494, 97 S. Ct. 1932, 52 L. Ed. 2d 531 (1977).

The National Association of Homes For Children, the largest nation-wide organization in the field of group residential care for children, and consisting mainly of duly licensed child caring agencies* has a special interest in this matter—not only because its members care for children in various living arrangements on a daily basis, but also because the ordinance at issue, if upheld, could potentially affect living arrangements of children in foster care nationwide and cause substantial alterations of heretofore family-type living for thousands of youngsters who, through no fault of their own, but for the most part as the result of being abused, neglected or abandoned, are in a foster care system.

The basis of the Court's decision in this case will be of great importance in guiding both local communities and child caring agencies concerning future utilization of single family homes for foster children in areas zoned for one family occupancy. The Court will be assisted, the NAHC believes, by the broad perspective, based upon years of study and experience in all aspects of child care, which this *amicus* can provide. The parties to the case, while surely experienced in the state of Indiana, may not be as fully acquainted with the experience of other states and the issues which have been brought to the attention of other courts throughout the country in cases similar to the case at bar, as well as the overall historical perspective of various types of foster care.

---

* See Appendix A for list of membership.

The NAHC believes that the attached brief will be of assistance to the Court in its consideration of the constitutional issues raised and therefore requests leave to file the annexed brief as *amicus curiae*.

Dated: March 1, 1985

Respectfully submitted

GERALD E. BODELL
DAVID H. BERMAN
Counsel to the National Association of Homes For Children
100 Park Avenue
New York, New York 10017
(212) 972-0909

TABLE OF CONTENTS

PAGE

Interest of Amicus Curiae 1

Introduction 2

Summary of Argument 4

ARGUMENT

THE ORDINANCE IS UNCONSTITUTIONAL AS APPLIED TO THIS LIVING ARRANGEMENT 5

A. THE ORDINANCE AT THE ISSUE IS UNCONSTITUTIONALLY VAGUE 5

B. THIS ZONING ORDINANCE CONSTITUTES A VIOLATION OF DUE PROCESS OF LAW 7

C. THE ORDINANCE IS VIOLATIVE OF THE AGENCY'S AND THE CHILDREN'S RIGHTS TO EQUAL PROTECTION OF LAW 8

CONCLUSION 11

APPENDIX A 13

TABLE OF AUTHORITIES

Cases	PAGE
Abbott House v. Villages of Tarrytown, 34 A.D. 2d 821, 312 N.Y.S 2d 841 (1970)	3
Berger v. State of New Jersey, 71 N.J. 206, 364 A. 2d 993 (1976)	7-8
City of White Plains v. Ferraoli, 34 N.Y. 2d 300, 313 N.E. 2d 756 (1974)	3, 6, 10
Costley v. Caromin House Inc., 313 N.W. 2d 21 (1981)	3
Grayned v. City of Rockford, 408 U.S. 104 (1972)	6
Hessling v. Broomfield, 193 Colo. 124, 563 P. 2d 12 (1977)	3
McLaughlin v. Florida, 374 U.S. 184 (1964)	8
Moore v. City of East Cleveland, 431 U.S. 494 (1977)	ii, 5, 9, 10
NAACP v. Burton, 371 U.S. 415 (1963)	10
Plyer v. Doe, 457 U.S. 102 (1982)	9
Poe v. Ullman, 367 U.S. 497 (1961)	9
Schad v. Borough of Mt. Ephraim, 452 U.S. 61 (1981)	7
Shapiro v. Thomson, 394 U.S. 618 (1969)	9
Village of Belle Terre v. Boraas, 416, U.S. 1 (1974)	ii, 5, 6, 11
Village of Euclid v. Ambler Realty Co., 272 U.S. 365 (1926)	7, 11

Other Authorities

Ainsworth and Fulcher (eds.): "Group Care For Children", Tavistock Publications (1981)	2
Citizen's Committee for Children of New York, Inc.: "The Foster Care Exit—Ready or Not" (1984)	2
Mayor's Task Force on Foster Care: "Redirecting Foster Care", New York City (1980)	2

IN THE

Supreme Court of the United States

OCTOBER TERM, 1984

No. 84-1294

THE VILLAGES, INC.,

Petitioner,

—v.—

THE METROPOLITAN DEVELOPMENT COMMISSION OF MARION COUNTY,

Respondent.

ON WRIT OF CERTIORARI TO THE
COURT OF APPEALS OF INDIANA, THIRD DISTRICT

BRIEF OF NATIONAL ASSOCIATION OF HOMES FOR CHILDREN AS AMICUS CURIAE

The National Association of Homes For Children respectfully submits this brief as *amicus curiae* in support of the position that the statute at issue, prohibiting a married couple and several foster children from residing together as a single housekeeping unit in a home situated in an area zoned for one family dwelling, is unconstitutional as applied to this particular residence.

Interest of *Amicus Curiae*

The interest of the National Association of Homes For Children (NAHC) is set forth in the preceding motion for leave to file this brief.

Introduction

The type of care provided for children whose parents are unable or unwilling to care for them has undergone profound changes over the last several decades. Large institutions in which such unfortunate children lived their early years *en masse*, sleeping in huge dormitories and overseen by masters and matrons have been largely consigned to history, although "sepia photographs recording this stage of the child care profession still cast a long shadow over annual reports of voluntary bodies and the corridors of institutions now trying to promote small living groups for the residents."[1] Indeed, virtually the entire emphasis in child care is on smaller living arrangements than heretofore.[2]

A child typically enters a foster care system through a voluntary placement by a parent or by court placement owing to neglect or abuse of the child.[3] If return to a parent is feasible, such return is accomplished. In many cases, however, return is delayed or indeed foreclosed for any of several reasons. In the meanwhile, the child will have resided somewhere within the foster care agency. Although living arrangements vary, basically a child usually resides in a foster home with one or two foster parents and perhaps other children, a residential treatment center or other institutional setting, or some other alternative setting.[4]

---

1 "Group Care for Children" (ed. Ainsworth and Fulcher), Tavistock Publications, London and New York, 1981 (Forword, p. vii.).

2 Much emphasis is of course placed on preventive services (see, e.g., "Redirecting Foster Care", Mayor's Task Force on Foster Care, New York City, 1980). However, we are here concerned with children who are within a foster care system.

3 There are few true "foundlings", but occasionally one is "left on the doorstep" and in that manner enters the foster care system.

4 There are many thousands of children in foster care systems throughout the country. Indeed a study conducted in 1983 found that in New York City alone, some 18,000 children were in foster care. "The Foster Care Exit—Ready or Not", Citizens's Committee For Children of New York, Inc., 1984, p. 56.

One such alternative setting is a living arrangement whereby a limited number of children live in a simulated family atmosphere with an adult couple, approximating a normal family environment in the community. With this type of living arrangement, the children obtain many of the benefits of a home and family life which would otherwise be denied them.

The problem is the location of the homes. Although everyone sympathizes with the children, few want them as neighbors even though it is conceivable that some children could have originated from the same neighborhood. The homes have encountered the opposition of certain communities who have either cited existing local zoning laws or have hastily enacted such laws, which typically limit occupancy of one family houses in a "single family zone" to a small number of unrelated adults.

These communities have then contended that the home in question is not a single family use and, depending upon the community, either require a special permit in order to operate in the "single family zone" or attempt to exclude the home, typically because it is termed a boarding house.

There presently exists diversity in the several circuits with respect to whether the type of home in question qualifies as a family and thus constitutes a permitted use under the local statutes (*City of White Plains* v. *Ferraoli*, 34 N.Y. 2d 300, 357 N.Y.S. 2d 449, 313 N.E. 2d 756 1974), as well as whether such local statutes as seek to limit the use and occupancy of these premises violate constitutional guarantees such as due process and equal protection of law. In some cases, it has been argued that the states have pre-empted the issue by means of their involvement in the foster care system and that it is beyond the authority of local governments to enact legislation which would have the effect of undermining state regulation of the area. *Costley* v. *Caromin House, Inc.*, 313 N.W. 2d 21 (Sup. Ct. of Minn. 1981); *Hessling* v. *Broomfield*, 193 Colo. 124, 563 P. 2d 12 (Sup. Ct. of Colorado 1977); *Abbott House* v. *Village of Tarrytown*, 34 A.D. 2d 821, 312 N.Y.S. 2d 841 (App. Div., N.Y., 2nd Dept., 1970).

The case at bar, where both sides have cited cases from various parts of the country, points up the need for guidance by this Court in solving this very real and extremely important problem.

SUMMARY OF ARGUMENT

As shown in the introduction, there is a compelling need for guidance by the Court in this field. State appeals courts have made conflicting rulings in cases similar to the case at bar and uncertainty exists concerning vital questions of child care, an ever-increasing concern to virtually every community. A decision which appropriately sets forth a clear, generally applicable principle to determine the validity of zoning ordinances such as the one under consideration here can eliminate this harmful uncertainty.

As shown in Subdivision A of the Argument, the ordinance is unconstitutionally vague, as it fails to define the term "family", which forms the crux of the ordinance. This results in a failure to afford persons of ordinary intelligence reasonable opportunity to know what is prohibited, arbitrary and discriminatory enforcement of the ordinance, and an inhibiting of constitutionally protected activity.

As shown in Subdivision B, the zoning ordinance constitutes a violation of due process of law. As applied to exclude these children from the subject premises, the ordinance serves none of the purposes of local zoning ordinances—it does not serve to promote health, safety, morals or the general welfare of the community. There is no showing of any potential harm to the community from the existence of this home, and efforts to exclude it on zoning grounds constitute a patent denial of the due process rights of the children, as well as the sponsoring agency.

As shown in Subdivision C, the ordinance is violative of the agency's and the children's rights to equal protection of law. As the right of children to live free of institutional settings is

involved, a liberty interest is at stake. In addition, the basic right of association is at stake. Both of these require that the community show a compelling governmental interest, the absence of which voids the statute. Even under the less stringent standard the ordinance fails, as there is no rational furthering of a legitimate, articulated governmental interest by virtue of the exclusion of this home.

ARGUMENT

THE ORDINANCE IS UNCONSTITUTIONAL AS APPLIED TO THIS LIVING ARRANGEMENT

Although the Supreme Court held facially valid an ordinance regulating the number of unrelated adults living in a residence (*Village of Belle Terre v. Boraas*, 416 U.S.1, 94 S.Ct. 1536, 39 L. Ed. 2d 797 (1974)), it has not faced this issue with regard to a residence which to all outward appearances functions like a family, except that its members are unrelated by blood. Indeed, in *Moore v. City of East Cleveland*, 431 U. S. 494, 97 S.Ct. 1932, 52 L. E. 2d 531 (1977), the Court did not hesitate to invalidate a zoning ordinance which attempted to narrowly define the relationship that the community felt must exist among adults and children in a living arrangement. In *Moore* the ordinance had limited occupancy of a dwelling unit to members of a single family and limited such family to a few categories of related individuals. The ordinance in question in the case at bar violates several constitutional provisions in its application to the Indiana home.

A

THE ORDINANCE AT ISSUE IS UNCONSTITUTIONALLY VAGUE

This Court has held that vague statutes may offend the Constitution in three ways: (1) they may trap the innocent by failing to give a person of ordinary intelligence reasonable

opportunity to know what is prohibited so that he may act accordingly; (2) they may result in arbitrary and discriminatory enforcement in the absence of explicit guidelines for their application; and (3) where they implicate First Amendment freedoms, they may inhibit constitutionally protected activity. *Grayned v. City of Rockford*, 408 U.S. 104, 108-109, 92 S.Ct. 2294, 2298-99, 33 L. Ed. 2d 222 (1972).

This statute offends the Constitution in all three ways. The statute deals with one and two family dwellings, restricting certain areas to one family. Yet nowhere in the statute is there a definition of the term "family"! It is inexplicable that this statute fails to define a term which in effect forms the crux of the statute.

In *Boraas supra* the ordinance defined a family as one or more persons related by blood, adoption or marriage, or not more than two unmarried persons living and cooking together as a single housekeeping unit under one roof and utilizing one set of facilities. That statute was thus quite specific in its definition of "family". Likewise, a New York ordinance limited "family" to a spouse, parents, grandparents, grandchildren, children or siblings living together as a single houskeeping unit with kitchen facilities. *City of White Plains v. Ferraoli*, 34 N.Y. 2d 300, 357 N.Y.S. 2d 449, 313 N.E. 2d 756 (1974). While, of course, the ordinances in the various communities which have reached the courts are too numerous to enumerate, the word "family" is invariably defined. Here, however, it is not, as the result of which: (1) the Villages has not been given reasonable opportunity to know what is prohibited; (2) the ordinance has resulted in arbitrary and discriminatory enforcement against this home; and (3) the ordinance impedes constitutionally protected activity. Thus each of the facets cited by this Court in *Grayned v. City of Rockford* is present here, rendering the statute unconstitutional.

B

THIS ZONING ORDINANCE CONSTITUTES A VIOLATION OF DUE PROCESS OF LAW

It is hornbook law that local zoning ordinances, usually authorized by town of village laws, have as their exclusive purpose the promoting of health, safety, morals, or the general welfare of the community. *Village of Euclid v. Ambler Realty Co.*, 272 U.S. 365,47 S.Ct. 114, 71 L. Ed. 303 (1926); *Schad v. Borough of Mt. Ephraim*, 452 U.S. 61,101 S.Ct. 2176, 68 L. Ed. 2d 671 (1981).

As applied to exclude these children from the subject premises and compel them to reside in an institution, the ordinance serves none of these specified purposes. Moreover, and perhaps ironically, the health, safety and morals of children in group homes are carefully supervised; the home must be a healthful environment and meet rigid safety standards, including local building and fire codes.[5] As to the general welfare of the community, it should be emphasized that these children are not in this house because they have been charged with crimes, nor do they present any danger or detriment to the community different from a family with the like number of children of the same age as these. The fact that they are not related by blood in no manner increases the likelihood of detriment to the general welfare of the community. These children are in this home because their parents are unwilling or unable to care for them; some are abused, some neglected. Nowhere in this entire record is there the merest showing that this home or others like it present a threat of harm to the community, be it the health, safety or general welfare. Thus exclusion of the home constitutes a deprivation of property without due process of law. As the Supreme Court of New Jersey aptly stated in *Berger v.*

---

5 As these homes are under the aegis of state departments of social services, it is the state which will normally see to it that such standards are met.

State of New Jersey, 71 N.J. 206, 364 A. 2d 993, 1002 (1976), a case involving the attempt by a local community to exclude a group home for multi-handicapped pre-school children as violative of local zoning:

> "Nevertheless, while municipalities are free to zone in such a way as will best attain these values, and to prohibit from such areas any use which threatens to erode such values or destroy the residential character of the area, all restrictions must, at the same time, satisfy the demands of due process. Substantive due process requires that zoning regulations be reasonably exercised; they may be neither unreasonable, arbitrary nor capricious. The means chosen must have a real and substantial relation to the end sought to be achieved. Moreover, the regulation must be reasonably designed to resolve the problem without imposing unnecessary and excessive restrictions on the use of private property."

C

THE ORDINANCE IS VIOLATIVE OF THE AGENCY'S AND THE CHILDREN'S RIGHTS TO EQUAL PROTECTION OF LAW

The basic test with respect to equal protection has been stated quite simply by this Court: When different groups are treated differently, the classifications must be reasonable and just in terms of the objective of the statute:

> "Classifications must always rest upon some difference which bears a reasonable and just relationship to the act in respect of which the classification is proposed and can never be made arbitrarily and without any such basis." *McLaughlin v. Florida*, 379 U.S. 184, 190, 85 S.Ct. 283 13 L. Ed. 2d 222 (1964).

The Court has set up two standards in assessing the constitutional validity of statutes under the equal protection law. These depend upon the right infringed upon as well as the existence

of a discriminatory classification. *Plyer v. Doe*, 457 U.S. 202, 102 S. Ct. 2382, 72 L. Ed. 2d 786 (1982) (Concurring opinion by *Blackmon, J.*). Where invidious discrimination is present, in the form of a patently suspect classification, or where the exercise of a fundamental constitutional right is at issue, strict judicial scrutiny is required, *Shapiro v. Thomson*, 394 U. S. 618 89 S.Ct. 1322, 22 L. Ed. 2d 600 (1969), and a compelling state interest must be shown in order to sustain the statute. Where no such issue is involved, the test is whether the statute rationally furthers some legitimate articulated state purpose. *Shapiro v. Thomson, supra.*

In our case, we urge that the strict judicial scrutiny test is required as the exercise of fundamental constitutional rights is at issue.

The first of these rights is liberty. The record is clear that should this facility be forced to close, it is probable that the children involved would be compelled to reside in institutional facilities.

This Court has discussed the concept of "liberty" in *Moore v. City of East Cleveland, supra* in which it invalidated an ordinance which limited occupancy of a dwelling unit to members of a single family, and limited such family to a few categories of related individuals. In invalidating the Cleveland ordinance, the Court, quoting Justice Harlan's dissenting opinion in *Poe v. Ullman*, 367 U. S. 497, 543, 81 S. Ct. 1752, 1776-7, 6 L. Ed. 2d 989, 1019 (196l), stated:

> ". . . [T]he full scope of the liberty guaranteed by the Due Process Clause cannot be found in or limited by the precise terms of the specific guarantees elsewhere provided in the Constitution. This 'liberty' is not a series of isolated points pricked out in terms of the taking of property; the freedom of speech, press, and religion; the right to keep and bear arms; the freedom from unreasonable searches and seizures; and so on. It is a rational continuum which, broadly speaking, includes a freedom from all substantial arbitrary impositions and purposeless

> restraints . . . and which also recognizes, what a reasonable and sensitive judgment must, that certain interests require particularly careful scrutiny of the state needs asserted to justify their abridgment." *Moore v. City of East Cleveland, supra*, at 502.

The ordinance at issue here as enforced against this home would deprive its members of the liberty of residing in a family-like setting and is thus constitutionally impermissible.

In addition, the ordinance restricts the freedom of association guaranteed by the Constitution. See *NAACP v. Burton*, 371 U. S. 415, 83 S. Ct. 328, 9 L.E. 2d 405 (1963). Should this home be compelled to close, its members would have little say in where and with whom they would reside. Nor would the moving of the entire household to another neighborhood solve the problem, as such moves to an appropriate setting can seldom be accomplished *en masse*.

Since these constitutionally guaranteed rights are involved, we urge that the ordinance be considered in the light of the strict judicial scrutiny test and barring a compelling governmental interest, obviously absent here, that the ordinance be declared void. *Moore v. City of East Cleveland, supra*.

However, even should the less stringent test be applied, that of whether the ordinance rationally furthers some legitimate, articulated governmental interest, we urge that this ordinance fails to pass constitutional muster.

It must first be noted that the record is entirely devoid of any articulated purpose for the ordinance. However, even should such purpose be assumed by the Court, and even should this Court hold that the community has a proper purpose in limiting the uses in a zone to single family units, the ordinance may still be unconstitutional. Citing numerous cases from various states, the New York Court of Appeals in *City of White Plains v. Farraioli*, 34 N Y 2d 300, 313 N.E. 2d 757, while conceding that the city of White Plains had a proper purpose in limiting uses in a zone to single family units, went on to say (at 305):

> "But if it goes beyond to require that the relationships in the family unit be those of blood or adoption, then its definition of family might be too restrictive (see, *Kirsch Holding Company v. Borough of Manasquan*, 59 N. J. 241, 250, 281 A 2d 513, 518; *City of Des Plaines v. Trottner*, 34 Ill. 2d 432, 216 N. E. 2d 116 [per Schaefer, J.]; *Boston-Edison Protective Assn. v. Paulist Fathers*, 306 Mich. 253, 10 N. W. 2D 847."

Nor is Village of *Belle Terre v. Boraas*, *supra*, dispositive of this issue. *Belle Terre* held only that occupancy restrictions based upon biological family ties do not violate Federal First Amendment rights. However, it is well settled that to satisfy constitutional guarantees, the ordinance must be rationally related to a legitimate public purpose. *Village of Euclid v. Ambler*, *supra*.

What we have here is no more or less than a community effort to exclude these children so as to "immunize" it from youngsters who, often through no fault of their own, are placed in a facility. Such immunization and exclusion are constitutionally impermissible.

CONCLUSION

For the foregoing reasons, the Petition for a Writ of Certiorari should be granted to review the judgment of the Court of Appeals in Indiana. In the alternative, the petition should be held pending disposition of *City of Cleburne v. Cleburne Living Center* (No. 84-468).

Respectfully submitted,

GERALD E. BODELL
DAVID H. BERMAN
Counsel to National Association of Homes For Children
100 Park Avenue
New York, New York 10017
(212) 972-0909

MEMBERSHIP OF NATIONAL ASSOCIATION OF HOMES FOR CHILDREN

APPENDIX A

Abbott House Inc.—Mitchell, South Dakota
Abilene Girls Home, Inc.—Abilene, Texas
Adriel School—West Liberty, Ohio
Advent Christian Home—Dowling Park, Florida
Adventure Bound School—Charlottesville, Virginia
Alaska Baptist Family—Anchorage, Alaska
Allendale School for Boys—Lake Villa, Illinois
American Children's Home—Lexington, North Carolina
American Home Finding Association—Ottumwa, Iowa
Amherst H. Wilder Foundation—St. Paul, Minnesota
Andrus Children's Home—Yonkers, New York
Archdeacon Gilfillan Center—Bemidji, Minnesota
Arden Shore Association—Lake Bluff, Illinois
Arizona Baptist—Phoenix, Arizona
Arizona Boys Ranch—Boys Ranch, Arizona
Arkansas Baptist Family—Little Rock, Arkansas
Assurance Home—Roswell, New Mexico
Bachman Memorial Home, Inc.—Cleveland, Tennessee
Baker Hall—Lackawanna, New York
Baptist Children's Home—Madill, Oklahoma
Baptist Children's Home—Oklahoma City, Oklahoma
Baptist Children's Home—Owasso, Oklahoma
Baptist Children's Home—San Antonio, Texas
Baptist Children's Homes—Thomasville, North Carolina
Baptist Children's Services—Philadelphia, Pennsylvania
Baptist Children's Village—Jackson, Mississippi
Baptist Home for Children—Bethesda, Maryland
Barat Human Services—Detroit, Michigan
Barium Springs Home for Children—Barium Springs, North Carolina
Bashor Home—Goshen, Indiana
Beacon House—Jasper, Alabama
Beckley Child Care Center—Beckley, West Virginia
Beech Acres-General—Cincinnati, Ohio
Bellefaire—Cleveland, Ohio

Bellewood Presbyterian Home—Anchorage, Kentucky
Berea Children's Home—Berea, Ohio
Bethany Children's Home—Womelsdorf, Pennsylvania
Bethany House, Inc.—Cordova, Maryland
Bethel Bible Village—Hixon, Tennessee
Boles Home for Children—Quinlan, Texas
Bowling Brook Home for Boys—Middleburg, Maryland
Boys & Girls Home—Lake Waccamaw, North Carolina
Boys Farm, Inc.—Newberry, South Carolina
Boys Haven of America—Beaumont, Texas
Boys Home of North Carolina, Inc.—Lake Waccamaw, North Carolina
Boys Home of the South, Inc.—Belton, South Carolina
Boys' Home, Inc.—Covington, Virginia
Boys Ranch—Gore, Oklahoma
Boys Ranch Town—Edmond, Oklahoma
Boys Ranch Town—Oklahoma City, Oklahoma
Boy's Republic—Farmington Hills, Michigan
Boys Village—Lake Charles, Louisiana
Boys Village, Inc.—Milford, Connecticut
Boys' Village, Inc.—Smithville, Ohio
Boysville of Michigan—Farmington Hills, Michigan
Boysville, Inc.—Converse, Texas
Brantwood-The Children's Home—Montgomery, Alabama
Brookland Plantation Home for Boys—Orangeburg, South Carolina
Brooklawn, Inc.—Louisville, Kentucky
Brooklyn Home for Children—Forest Hills, New York
Broyhill Home—Clyde, North Carolina
Buckner Baptist—Dallas, Texas
Buckner Baptist Benevolences—Dallas, Texas
Buckner Baptist Boys Ranch—Burnet, Texas
Buckner Children's Village—Beaumont, Texas
Buckner South Texas Center—San Antonio, Texas
Buckner West Texas Center—Lubbock, Texas
Burlington United Methodist Home—Burlington, West Virginia
Butterfield Youth Services, Inc.—Marshall, Missouri

Camp Oakland Youth Programs, Inc.—Oxford, Michigan
Campus House, Inc.—Kearney, Nebraska
Carmelite Home, Inc.—Wauwatosa, Wisconsin
Carrie-Steele Pitts—Atlanta, Georgia
Catholic Children's Home—Alton, Illinois
Cayuga Home For Children—Auburn, New York
Central Texas Children's Home—Buda, Texas
Chaddock Boys School—Quincy, Illinois
Charles L. Hall Youth Services—Bismarck, North Dakota
Cherokee Children's Home—Cherokee, North Carolina
Cherokee Home for Children—Cherokee, Texas
Child & Family Services—Saginaw, Michigan
Child Care Services—Charlotte, North Carolina
Child Center of Our Lady—St. Louis, Missouri
Children's Aid Society—Mercer, Pennsylvania
Children's Aid Society Home—Clearfield, Pennsylvania
Children's Farm Home of Oregon—Corvallis, Oregon
Children's Home—Binghamton, New York
Children's Home—Winston-Salem, North Carolina
Children's Home of Burlington County—Mt. Holly, New Jersey
Children's Home of Cedar Rapids—Cedar Rapids, Iowa
Children's Home of Detroit—Grosse Pointe Woods, Michigan
Children's Home of Easton—Easton, Pennsylvania
Children's Home of Jefferson County—Watertown, New York
Children's Home of Lubbock—Lubbock, Texas
Children's Home of Poughkeepsie—Poughkeepsie, New York
Children's Home of Wheeling, Inc.—Wheeling, West Virginia
Children's Home of York—York, Pennsylvania
Children's Services—Syracuse, New York
Children's Services, Inc.—Amarillo, Texas
Children's Village—Tyler, Texas
Christian Appalachian Project—Nicholasville, Kentucky
Christian Church Children's—Danville, Kentucky
Christian Family Services, Inc.—Gainesville, Florida
Christian Haven Homes—Wheatfield, Indiana
Christian Home—Mt. Dora, Florida
Christian Home Association—Council Bluffs, Iowa

Christie School—Marylhurst, Oregon
Coastal Bend Youth City—Corpus Christi, Texas
Connie Maxwell Children's Home—Greenwood,
South Carolina
Covenant Children's Home—Princeton, Illinois
Covington Protestant—Covington, Kentucky
Crossnore School, Inc.—Crossnore, North Carolina
CROSSROAD—Fort Wayne, Indiana
Cumberland Presbyterian—Denton, Texas
Cummings Zucker Center—Toledo, Ohio
Dakota Boys Ranch—Minot, North Dakota
David & Margaret Home for Children—LaVerne, California
Davis-Stuart, Inc.—Lewisburg, West Virginia
Denver Children's Home—Denver, Colorado
Dept. of Child Care—Oklahoma City, Oklahoma
Double-K-Ranch—Seattle, Washington
Eagle Boys Village, Inc.—Hersey, Michigan
East Texas Guidance Center, Inc.—Tyler, Texas
Eckert Youth Homes—Williston, North Dakota
Edgefield Lodge, Inc.—Troutdale, Oregon
Edgewood Acres—Grand Rapids, Michigan
El Pueblo Boys Ranch—Pueblo, Colorado
Eliada Homes, Inc.—Asheville, North Carolina
Elks Aidmore Children's Home—Conyers, Georgia
Elon Home For Children—Elon College, North Carolina
Episcopal Child Care Services—Charlotte, North Carolina
Episcopal Church Home for Children—York, South Carolina
Epworth Children's Home—Columbia, South Carolina
Epworth Village, Inc.—York, Nebraska
Evangelical Children's Home—St. Louis, Missouri
Excelsior Youth Center—Spokane, Washington
Fair Haven Children's Home—Strafford, Missouri
Falcon Children's Home, Inc.—Falcon, North Carolina
Family and Children's Center, Inc.—Mishawaka, Indiana
Family Services—Minneapolis, Minnesota
Father Flanagan Boy's Home—Boy's Town, Nebraska
Father Maloney's Boys' Haven—Louisville, Kentucky

Five Acres-The Boys' & Girls'—Altadena, California
Five Points Campus—Pomona, New York
Flat Rock Children's Home—Flat Rock, Ohio
Florence Crittenton—Wheeling, West Virginia
Florida Baptist—Miami, Florida
Florida Baptist Children's Home—Lakeland, Florida
Florida Baptist Children's Home—Lakeland, Florida
Florida Baptist Children's Home—Tallahassee, Florida
Florida Sheriffs Boys Ranch—Boys Ranch, Florida
Florida Sheriffs' Girls Villa—Bartow, Florida
Florida Sheriffs Youth Camp—Barberville, Florida
Florida Sheriffs Youth Fund, Inc.—Boys Ranch, Florida
Florida Sheriffs Youth Ranch—Safety Harbor, Florida
Florida United Methodist—Enterprise, Florida
Frances E. Willard Home, Inc.—Tulsa, Oklahoma
Friends Association for Care—West Chester, Pennsylvania
Gateway United Methodist Youth Center—Williamsville, New York
Georgia Baptist Children's Home—Baxley, Georgia
Georgia Baptist Children's Home—Meansville, Georgia
Georgia Baptist Children's Home—Palmetto, Georgia
Georgia Baptist Children's Home, Inc.—Atlanta, Georgia
Georgia Sheriff's—Dalton, Georgia
German Children's Home—Catonsville, Maryland
Gibault School for Boys—Terre Haute, Indiana
Girls' Haven—Huntersville, North Carolina
Glenwood School for Boys—Glenwood, Illinois
Grandfather Home for Children—Banner Elk, North Carolina
Greer-Woodycrest Children's Services—Millbrook, New York
Griffith Center, Inc.—Golden, Colorado
Group Homes for Children, Inc.—Montgomery, Alabama
Guadalupe Home for Boys—Yucaipa, California
Guadalupe Home for Boys, Inc.—Redlands, California
Guardian Angel Home—Joliet, Illinois
Gustavus Adolphus Children's Home—Jamestown, New York
Hannah Neil Center for Children—Columbus, Ohio
Harris Home for Children—Huntsville, Alabama
Haven of Rest—Belton, South Carolina

Henderson Settlement—Frakes, Kentucky
Hendrick Home for Children—Abilene, Texas
High Plains Children's Home—Amarillo, Texas
High Sky Girls Ranch—Midland, Texas
Highfields, Inc.—Onondaga, Michigan
Highland Heights—New Haven, Connecticut
Hillcrest Family Services—Dubuque, Iowa
Hillside Cottages, Inc.—Atlanta, Georgia
Hillsides—Pasadena, California
Hillview Acres—Chico, California
Holly Hill Children's Home—Cold Spring, Kentucky
Holston United Methodist Home—Greeneville, Tennessee
Home of the Good Shepherd—St. Paul, Minnesota
Honey Creek Christian Homes—Lowell, Michigan
Hope Center for Youth—Houston, Texas
Hoyleton Children's Home—Hoyleton, Illinois
Hudelson Baptist Children's Home—Centralia, Illinois
Hughes Memorial Home for Children—Danville, Virginia
I.O.O.F. Children's Home—Corsicana, Texas
Idaho Youth Ranch—Boise, Idaho
Indiana Children's—Ladoga, Indiana
Indiana United Methodist—Lebanon, Indiana
Inter-Mountain Deaconess Home—Helena, Montana
J Bar D Boy's Ranch—Ione, Washington
Jack & Ruth Eckerd—Clearwater, Florida
Jackson Field Episcopal Girl's Home—Jarratt, Virginia
James Barry-Robinson Institute—Norfolk, Virginia
Jemez House, Inc.—Alcalde, New Mexico
John K. Crosswell Home—Sumter, South Carolina
Joy Ranch, Inc.—Hillsville, Virginia
Kemmerer Village—Assumption, Illinois
Kenai Peninsula Community Care Center—Kenai, Alaska
Kennedy Home—Kinston, North Carolina
Kentucky Baptist Board of Child Care—Middletown, Kentucky
Ketchikan Children's Home—Ketchikan, Alaska
Kodiak Baptist Mission, Inc.—Kodiak, Alaska
La Crosse Home for Children—La Crosse, Wisconsin

Lake County Boys' Ranch—Altoona, Florida
Lakeside Boys & Girls Home—Kalamazoo, Michigan
LaSalle School, Inc.—Albany, New York
Lee and Beulah Moor Children's Home—El Paso, Texas
Lee County Youth Development Center—Opelika, Alabama
Lena Pope Home, Inc.—Fort Worth, Texas
Little City Foundation—Chicago, Illinois
Long Beach Youth Center, Inc.—Long Beach, California
Longview—Buffalo, New York
Louisiana Baptist Children's Home—Monroe, Louisiana
Lourdesmont School—Clarks Summit, Pennsylvania
LSS Friendship House—Minneapolis, Minnesota
Lutheran Child & Family—Bay City, Michigan
Lutheran Social Services—Sioux Falls, South Dakota
Lutherwood—Indianapolis, Indiana
MacDonell United Methodist—Houma, Louisiana
Madonna Heights Services—Huntington, New York
Mankato Group Home—Mankato, Minnesota
Manuelito Navajo Children's Home, Inc.—Gallup, New Mexico
Maple Shade Residential Homes, Inc.—Salisbury, Maryland
Maude Carpenter Children's Home—Wichita, Kansas
McAuley Home for Girls—Buhl, Idaho
McCrossan Boy's Ranch—Sioux Falls, South Dakota
McQuade Foundation—New Windsor, New York
Memphis Boys Town, Inc.—Memphis, Tennessee
Mercy Boys Home—Chicago, Illinois
Methodist Board of Child Care—Baltimore, Maryland
Methodist Home—Macon, Georgia
Methodist Home—Waco, Texas
Methodist Home for Children—Raleigh, North Carolina
Methodist Home of Kentucky, Inc.—Versailles, Kentucky
Mid-Western Children's Home—Pleasant Plain, Ohio
Miller Home of Lynchburg—Lynchburg, Virginia
Missouri Baptist Children's Home—Bridgeton, Missouri
Missouri Girls Town Foundation, Inc.—Kingdom City, Missouri
Monroe Harding Children's Home—Nashville, Tennessee

Morning Star Boys' Ranch—Spokane, Washington
Mount Saint John—Deep River, Connecticut
Murphy-Harpst—Cedartown, Georgia
Myron Stratton Home—Colorado Springs, Colorado
Nazareth House—Raleigh, North Carolina
New England Kurn Hattin Homes—Westminster, Vermont
New Horizons Ranch & Center, Inc.—Goldthwaite, Texas
New Mexico Baptist Children's Home—Portales, New Mexico
New Mexico Boys Ranch, Inc.—Boys Ranch, New Mexico
New Mexico Christian Children's Home—Portales, New Mexico
Niles Home for Children—Kansas City, Missouri
Nome Receiving Home, Inc.—Nome, Alaska
Norris Adolescent Center—Mukwonago, Wisconsin
North Carolina Child—Lexington, North Carolina
North Idaho Children's Home—Lewiston, Idaho
Northeast Parent & Child Society—Schenectady, New York
Northwood Children's—Duluth, Minnesota
NYS Council of Voluntary—New York, New York
Ohio Assoc. of Child Caring Agencies—Columbus, Ohio
Oklahoma United Methodist Home—Tahlequah, Oklahoma
Our Lady of Victory Infant Home—Lackawanna, New York
Pacific Lodge Boys' Home—Woodland Hill, California
Palmer Home for Children—Columbus, Mississippi
Parent & Child Development—Savannah, Georgia
Patrick Henry Boys Plantation, Inc.—Brookneal, Virginia
Paul Anderson Youth Home—Vidalia, Georgia
Paul Anderson Youth Home—Lewisville, Texas
Presbyterian Child Welfare Agency, Inc.—Buckhorn, Kentucky
Presbyterian Children's Home—Austin, Texas
Presbyterian Children's Home—Wytheville, Virginia
Presbyterian Family Services, Inc.—Little Rock, Arkansas
Presbyterian Home for Children—Farmington, Missouri
Presbyterian Home, Inc.—Lynchburg, Virginia
Presbyterian Hospitality House—Fairbanks, Alaska
Rancho Damacitas—Rancho California, California
Randolph Children's Home—Randolph, New York

Real Life Children's—Okeechobee, Florida
Robert Boyd Ward Home—Pittsburgh, Pennsylvania
Rodeheaver Boys'—Palatka, Florida
Rood House Group Home—Mt. Vernon, Kentucky
Rosalie Manor Mary Center West—Brookfield, Wisconsin
Rosemont School, Inc.—Portland, Oregon
Sacred Heart Home—Pueblo, Colorado
Saint Anne Institute—Albany, New York
Salem Children's Home—Flanagan, Illinois
Salesmanship Club Youth—Dallas, Texas
Salvation Army Home for Girls—San Antonio, Texas
San Felipe del Rio, Inc.—San Cristobal, New Mexico
San Felipe del Rio, Inc.—Taos, New Mexico
Sangralea Valley—Onward, Indiana
Seagrave House, Inc.—Orlando, Florida
Sheriffs Youth Programs—Austin, Minnesota
Sheriffs Youth Programs—Austin, Minnesota
Sheriffs Youth Programs—Isanti, Minnesota
Sherwood & Myrtie Foster Home—Stephenville, Texas
Silver Springs—Plymouth Meeting, Pennsylvania
Sipe's Orchard Home, Inc.—Conover, North Carolina
St. Aemilian Child Care Center, Inc.—Milwaukee, Wisconsin
St. Anne's Infant Home—Spokane, Washington
St. Ann's Home—Tacoma, Washington
St. Colman's Home—Watervliet, New York
St. John's Children's Home—Kansas City, Kansas
St. John's Home—Painesville, Ohio
St. John's School for Boys—White Water, California
St. Joseph Catholic Orphan Society—Louisville, Kentucky
St. Joseph's Children's Home—Oklahoma City, Oklahoma
St. Joseph's Home For Boys—St. Louis, Missouri
St. Joseph's Villa—Richmond, Virginia
St. Joseph's Villa of Rochester, Inc.—Rochester, New York
St. Mary's Boys Home—Beaverton, Oregon
St. Mary's Home—Savannah, Georgia
St. Michael's Farm for Boys, Inc.—Picayune, Mississippi
St. Peter-St. Joseph—San Antonio, Texas
St. Rose Residence, Inc.—Milwaukee, Wisconsin

St. Vincent's Home—Saginaw, Michigan
St. Vincent's Home—Fall River, Massachusetts
St. Vincent's Services, Inc.—Brooklyn, New York
Stanford Lathrop Memorial Home—Sacramento, California
Starr Commonwealth for Boys—Van Wert, Ohio
Still Creek Ranch—Bryan, Texas
Sugar Creek Children's Center, Inc.—Philippi, West Virginia
Summit Oaks Center—Sioux Falls, South Dakota
Sunburst Youth Homes, Inc.—Neillsville, Wisconsin
Sunny Glen Children's Home—San Benito, Texas
Sunny Ridge Family Center, Inc.—Wheaton, Illinois
Syntaxis, Inc.—Gahanna, Ohio
Tara Hall,—Georgetown, South Carolina
Teen Acres, Inc.—Sterling, Colorado
Teen Ranch Inc.—Marlette, Michigan
Tennessee Baptist Children's—Franklin, Tennessee
Tennessee Baptist Children's Home—Chattanooga, Tennessee
Tennessee Baptist Children's Homes—Memphis, Tennessee
Tennessee Baptist Children's Homes, Inc.—Brentwood, Tennessee
Texas Baptist Children's Home—Round Rock, Texas
Texas Baptist Home for Children—Waxahachie, Texas
The Cedar's, Inc.—Lincoln, Nebraska
The Children's Home of Cromwell—Cromwell, Connecticut
The Children's Home of Reading—Reading, Pennsylvania
The Children's Home, Inc.—Tampa, Florida
The Connecticut Jr. Republic—Litchfield, Connecticut
The Curtis Home—Meriden, Connecticut
The Elizabeth Lund Home, Inc.—Burlington, Vermont
The Hutton Settlement—Spokane, Washington
The JANUS Project—Salt Lake City, Utah
The Lutheran Orphan's—Toledo, Ohio
The Methodist Children's Home—Jackson, Mississippi
The Presbyterian Home for Children—Talladega, Alabama
The Salvation Army—Anchorage, Alaska
The Salvation Army—St. Paul, Minnesota
The Salvation Army Services—Detroit, Michigan
The South Texas Children's Home—Beeville, Texas

The Starr Commonwealth Schools—Albion, Michigan
The United Methodist Children's Home—Decatur, Georgia
The United Methodist Home—Mechanicsburg, Pennsylvania
The Young House—Burlington, Iowa
Third Way Center—Denver, Colorado
Thornwell Home and School—Clinton, South Carolina
Three Rivers Youth—Pittsburgh, Pennsylvania
Timothy Hill Children's Ranch—Riverhead, New York
Todd-Phillips—Detroit, Michigan
Trinity School for Children—Ukiah, California
Triple H—Tacoma, Washington
Try House Center—Marshall, Minnesota
Tulsa Boys Home—Tulsa, Oklahoma
Tupelo Children's—Tupelo, Mississippi
Turning Point Boys Ranch—Willow, Alaska
United Methodist Children's—Richmond, Virginia
United Methodist Children's Home—Mount Vernon, Illinois
United Methodist Children's Home—Worthington, Ohio
United Methodist Youthville—Newton, Kansas
United Presbyterian Children's Home—Waxahachie, Texas
United Presbyterian Home for Children—Mars, Pennsylvania
UTA Halee Girl's Village—Omaha, Nebraska
Utah Girls Village, Inc.—Salt Lake City, Utah
Vera Lloyd Children's Home—Monticello, Arkansas
Veterans of Foreign Wars National Home—Eaton Rapids, Michigan
Village of St. Joseph—Atlanta, Georgia
Virginia Baptist Children's Home—Annandale, Virginia
Virginia Baptist Children's Home—Hampton, Virginia
Virginia Baptist Children's Home—Richmond, Virginia
Virginia Baptist Children's Home—Salem, Virginia
Virginia Home for Boys—Richmond, Virginia
Waldo Burton Memorial Home—New Orleans, Louisiana
Waterford Country School, Inc.—Quaker Hill, Connecticut
Waverly Children's Home—Portland, Oregon
Webster-Cantrell Hall—Decatur, Illinois
West Virginia Child Care Assoc.—Huttonsville, West Virginia
Wiley House—Bethlehem, Pennsylvania

Woodfield Center—Beresford, South Dakota
Woodland Hills—Duluth, Minnesota
Woodland Home—Quincy, Illinois
Wyndham Lawn Home—Lockport, New York
Yellowstone Boys & Girls—Billings, Montana
Yellowstone Boys and Girls Ranch—Billings, Montana
YMCA Boys Home of Iowa—Johnston, Iowa
Youth Care Center—Evansville, Indiana
Youth Home of Victoria—Victoria, Texas
Youth Homes, Inc.—Little Rock, Arkansas
Youth Outreach, Inc.—Vancouver, Washington
Youth Residential Services—Akron, Ohio